

Exhibit 138

Defendant Zuffa, LLC's Responses to
Plaintiffs' Second, Third, and Fourth Set of
Requests for Admission (excerpted)

WILLIAM A. ISAACSON (*Pro Hac Vice*)
(wisaacson@bsflpp.com)
STACEY K. GRIGSBY (*Pro Hac Vice*)
(sgrigsby@bsflpp.com)
NICHOLAS A. WIDNELL (*Pro Hac Vice*)
(nwidnell@bsflpp.com)
BOIES SCHILLER FLEXNER LLP
1401 New York Avenue NW, Washington, DC 20005
Telephone: (202) 237-2727; Fax: (202) 237-6131

RICHARD J. POCKER #3568
(rpocker@bsflp.com)
BOIES SCHILLER FLEXNER LLP
300 South Fourth Street, Suite 800, Las Vegas, NV 89101
Telephone: (702) 382-7300; Fax: (702) 382-2755

DONALD J. CAMPBELL #1216
(djc@campbellandwilliams.com)
J. COLBY WILLIAMS #5549
(jcw@campbellandwilliams.com)
CAMPBELL & WILLIAMS
700 South 7th Street, Las Vegas, Nevada 89101
Telephone: (702) 382-5222; Fax: (702) 382-0540

*Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DEFENDANT ZUFFA, LLC'S
RESPONSES TO PLAINTIFFS' SECOND,
THIRD, AND FOURTH SET OF
REQUESTS FOR ADMISSION**

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

PROPOUNDING PARTY: Plaintiffs

RESPONDING PARTY: Defendant Zuffa, LLC

SET NO.: Two, Three, and Four

Pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, Defendant Zuffa, LLC (“Zuffa”) hereby objects and responds as follows to Plaintiffs’ Second, Third, and Fourth Set of Requests for Admission To Defendant Zuffa, LLC, including the “Instructions” and “Definitions” incorporated therein (collectively, the “RFAs” or the “Requests”):

GENERAL OBJECTIONS

1. Zuffa objects to the definition of “You,” “Your,” “Your Company,” “Zuffa,” “UFC,” and “Defendant” to the extent that this definition purports to encompass persons or entities that are not the named defendant, Zuffa, LLC. For any RFA using this definition, Zuffa responds only on behalf of the named defendant, Zuffa, LLC. Zuffa also objects to the extent that this definition seeks responses from predecessor companies or entities that were acquired by or merged with Zuffa. Zuffa further objects to this definition as vague, ambiguous, overbroad, and unduly burdensome to the extent that it encompasses or purports to encompass “any persons acting or purporting to act on behalf of the respondent Defendant.”

2. Zuffa objects to Instruction No. 2 to the extent it goes beyond the requirements of Federal Rules of Civil Procedure 26 and 36. To the extent information is withheld on a basis of privilege, Zuffa will produce a privilege log in the form agreed upon by the parties.

3. Zuffa objects to the RFAs to the extent that they seek information that is not otherwise calculated to lead to discoverable evidence.

4. Zuffa objects to the RFAs, including all Definitions and Instructions, to the extent they purport to impose upon Zuffa any requirements that exceed or are otherwise inconsistent with the Federal Rules of Civil Procedure or any other applicable rule or court order.

5. Zuffa objects to the RFAs to the extent that they purport to call for information protected from disclosure by applicable privileges, laws, doctrines or rules, including but not limited to the attorney-client privilege, work product doctrine, and any applicable domestic or foreign law, rule, order or agreement. The inadvertent disclosure of any privileged information

1 shall not constitute, or be deemed a waiver of, any applicable statutory, regulatory, common-law
 2 or other privilege with respect to such information. Zuffa hereby claims all applicable privileges
 3 and protections to the extent implicated by each RFA, and excludes privileged and protected
 4 information from the response to each RFA.

5 6. Zuffa objects to the RFAs to the extent that they are vague, overbroad, unduly
 6 burdensome, ambiguous, fail to specify with reasonable particularity the information sought,
 7 would unreasonably require Zuffa to speculate as to the nature and/or scope of the information
 8 sought, or seek information that is not relevant to the claims or defenses of the parties in the
 9 pending action or is not reasonably calculated to lead to the discovery of admissible evidence.

10 7. Zuffa objects to the RFAs to the extent that they imply the existence of facts or
 11 circumstances which do not or did not exist, and to the extent that they state or assume legal
 12 conclusions. In providing responses and objections to the RFAs, except as otherwise specified,
 13 Zuffa does not hereby admit, adopt or acquiesce to any factual or legal contention, presumption,
 14 assertion or characterization contained in the RFAs.

15 8. Zuffa reserves the right to later supplement or amend its responses to these RFAs.

16 9. The General Objections are incorporated into each of the following responses and
 17 shall be deemed continuing as to each response. These General Objections are not waived, or in
 18 any way limited, by the following responses.

RESPONSES AND OBJECTIONS TO RFAs

20 **REQUEST NO. 3.** Admit that on March 27, 2007, at a press conference in Tokyo, Japan held to
 21 announce Zuffa's purchase of Pride FC, Lorenzo Fertitta stated that "Pride is already a global
 22 power house," as reflected in Exhibit 1.

23 **RESPONSE NO. 3:** Zuffa hereby incorporates the General Objections as though stated in full
 24 herein. Zuffa further objects to Exhibit 1 as an incomplete representation of the event cited in this
 25 Request. Zuffa refers to Exhibit 1 cited in the Request for a complete representation of its
 26 contents.

27 Subject to and without waiver of its specific and general objections, Zuffa admits.

28 **REQUEST NO. 4.** Admit that on March 27, 2007, at a press conference in Tokyo, Japan held to
 29 announce Zuffa's purchase of Pride FC, Lorenzo Fertitta stated that "this transaction advances

1 Pride and the UFC way beyond and light years ahead of any other MMA organization," as
2 reflected in Exhibit 1.

3 **RESPONSE NO. 4:** Zuffa hereby incorporates the General Objections as though stated in full
4 herein. Zuffa further objects to Exhibit 1 as an incomplete representation of the event cited in this
5 Request. Zuffa refers to Exhibit 1 cited in the Request for a complete representation of its
6 contents.

7 Subject to and without waiver of its specific and general objections, Zuffa admits.

8 **REQUEST NO. 5.** Admit that on August 6, 2009, at the UFC 101 press conference in
9 Philadelphia, Pennsylvania, Dana White stated regarding Zuffa's failure to sign Fedor
10 Emelianenko to the UFC: "That anybody would consider this guy the best in the world – you
11 know, I was saying this before – now, who the f*** is he going to fight? Who's he going to fight?
12 Nobody. He's not going to fight anybody. He's going to fight nobodies," as reflected in Exhibit 2.

13 **RESPONSE NO. 5:** Zuffa hereby incorporates the General Objections as though stated in full
14 herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this
15 Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its
16 contents.

17 Subject to and without waiver of its specific and general objections, Zuffa admits.

18 **REQUEST NO. 6.** Admit that on August 6, 2009, at the UFC 101 press conference in
19 Philadelphia, Pennsylvania, Dana White stated regarding Zuffa's failure to sign Fedor
20 Emelianenko to the UFC: "They [Emelianenko's representatives] were claiming that there was
21 some things in the contract they couldn't live with. Funny, every other fighter on earth, you
22 know, can sign the contract," as reflected in Exhibit 2.

23 **RESPONSE NO. 6:** Zuffa hereby incorporates the General Objections as though stated in full
24 herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this
25 Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its
26 contents.

27 Subject to and without waiver of its specific and general objections, Zuffa admits that
28 Dana White stated in part that "They were claiming that there was some things in the contract
29 they couldn't live with. Funny, every other fighter on earth, you know, can sign the contract."

30 **REQUEST NO. 7.** Admit that on August 6, 2009, at the UFC 101 press conference in
31 Philadelphia, Pennsylvania, Dana White stated regarding Strikeforce that "[t]hey have no
32 fighters," and that fighters in Strikeforce "have nobody to fight," as reflected in Exhibit 2.

33 **RESPONSE NO. 7:** Zuffa hereby incorporates the General Objections as though stated in full
34 herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this
35 Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its
36 contents.

37 Subject to and without waiver of its specific and general objections, Zuffa admits that
38 Dana White stated in part that "they have no fighters" and "have nobody to fight."

1 **REQUEST NO. 8.** Admit that on August 6, 2009, at the UFC 101 press conference in
2 Philadelphia, Pennsylvania, Dana White stated that Strikeforce “should’ve stayed the way they
2 were,” as reflected in Exhibit 2.

3 **RESPONSE NO. 8:** Zuffa hereby incorporates the General Objections as though stated in full
4 herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this
5 Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its
5 contents.

6 Subject to and without waiver of its specific and general objections, Zuffa admits that
7 Dana White stated in part “should have stayed the way they were.” Zuffa otherwise denies this
7 Request.

8 **REQUEST NO. 9.** Admit that on August 6, 2009, at the UFC 101 press conference in
9 Philadelphia, Pennsylvania, in response to the question of whether Zuffa was “going to do the
10 same thing you did with Affliction and counterprogram,” Dana White stated: “You wanna fight
10 me? We’re gonna fight. And we know how that goes. And we know how it ends,” as reflected in
11 Exhibit 2.

11 **RESPONSE NO. 9:** Zuffa hereby incorporates the General Objections as though stated in full
12 herein. Zuffa further objects to Exhibit 2 as an incomplete representation of the event cited in this
13 Request. Zuffa refers to Exhibit 2 cited in the Request for a complete representation of its
13 contents.

14 Subject to and without waiver of its specific and general objections, Zuffa admits.

15 **REQUEST NO. 10.** Admit that in a March 2011, interview with Mike Straka on Inside MMA,
16 Dana White stated, “Am I pleased about all of the organizations we’ve crushed before them
17 [Strikeforce]? Absolutely. Yeah, the ones that came out and wanted to fight and wanted to make a
17 fight out of it. Absolutely. I’m 100% happy about that,” as reflected in Exhibit 3.

18 **RESPONSE NO. 10:** Zuffa hereby incorporates the General Objections as though stated in full
19 herein. Zuffa further objects to Exhibit 3 as an incomplete representation of the event cited in this
20 Request. Zuffa refers to Exhibit 3 cited in the Request for a complete representation of its
20 contents.

21 Subject to and without waiver of its specific and general objections, Zuffa admits that
22 Dana White stated in part “Am I pleased about all of people, the organizations we’ve crushed
22 before them? Absolutely. Yeah, the ones that came out and wanted to fight and wanted to make a
23 fight out of it. Absolutely. 100% happy about that.”

24 **REQUEST NO. 11.** Admit that in a March 4, 2011, episode of “Fighting Words with Mike
25 Straka,” Lorenzo Fertitta stated: “I will tell you that hands down the most important thing for our
26 company, and literally kind of the mantra of how we run this thing, is that all the verticals,
26 everything we do points to one thing, and there has to be a tie back to pay-per-view,” as reflected
in Exhibit 4.

27 **RESPONSE NO. 11:** Zuffa hereby incorporates the General Objections as though stated in full
28 herein. Zuffa further objects to Exhibit 4 as an incomplete representation of the event cited in this

1 Request. Zuffa refers to Exhibit 4 cited in the Request for a complete representation of its
2 contents.

3 Subject to and without waiver of its specific and general objections, Zuffa admits.

4 **REQUEST NO. 12.** Admit that in a March 4, 2011, episode of “Fighting Words with Mike
5 Straka,” Lorenzo Fertitta stated: “Look no one has an original idea. Really, at the end of the day,
6 you’re taking little things from all of these different areas to try to come up with ideas to make
7 your business better. You have – we looked at NASCAR with how they ran their business, and
8 how fan friendly they were and really tried to please the fans and create an experience for them.
You have WWE, which our model is very similar from a business stand point, the way pay-per-
view works, how they do everything. They do TV, everything they do bounces you to pay-per-
view, what I was talking about earlier. The same type of idea,” as reflected in Exhibit 4.

9 **RESPONSE NO. 12:** Zuffa hereby incorporates the General Objections as though stated in full
10 herein. Zuffa further objects to Exhibit 4 as an incomplete representation of the event cited in this
Request. Zuffa refers to Exhibit 4 cited in the Request for a complete representation of its
contents.

11 Subject to and without waiver of its specific and general objections, Zuffa admits.

12 **REQUEST NO. 13.** Admit that in a September 2011, interview at Zuffa’s headquarters in Las
13 Vegas, Nevada with media outlet Heavy MMA, Lorenzo Fertitta stated: “Sure, are there fighters
14 that are going to want to get paid more? Of course. There are always people that are unhappy,” as
reflected in Exhibit 5.

15 **RESPONSE NO. 13:** Zuffa hereby incorporates the General Objections as though stated in full
16 herein. Zuffa further objects to Exhibit 5 as an incomplete representation of the event cited in this
Request. Zuffa refers to Exhibit 5 cited in the Request for a complete representation of its
contents.

18 Subject to and without waiver of its specific and general objections, Zuffa admits.

19 **REQUEST NO. 14.** Admit that in unedited footage of an interview with Lorenzo Fertitta from a
20 segment on ESPN’s “Outside The Lines” released by Zuffa on January 16, 2012, Lorenzo Fertitta
stated in response to the question of whether the percentage of revenue that Zuffa pays fighters is
21 50%: “In that neighborhood, yeah. In that neighborhood,” as reflected in Exhibit 6.

22 **RESPONSE NO. 14:** Zuffa hereby incorporates the General Objections as though stated in full
23 herein. Zuffa further objects to Exhibit 6 as an incomplete representation of the event cited in this
Request. Zuffa refers to Exhibit 6 cited in the Request for a complete representation of its
contents.

25 Subject to and without waiver of its specific and general objections, Zuffa admits that
Lorenzo Fertitta stated in part “In that neighborhood, yeah. In that neighborhood.”

26 **REQUEST NO. 15.** Admit that in unedited footage of an interview with Lorenzo Fertitta from a
27 segment on ESPN’s “Outside The Lines” released by Zuffa on January 16, 2012, Lorenzo Fertitta
stated regarding Zuffa’s acquisition of Strikeforce: “From a fighter’s standpoint, we have taken

1 these fighters, and now we have the ability to allow them to make more money. They were stuck
2 in Strikeforce, where there was no pay-per-view revenue there,” as reflected in Exhibit 6.

3 **RESPONSE NO. 15:** Zuffa hereby incorporates the General Objections as though stated in full
4 herein. Zuffa further objects to Exhibit 6 as an incomplete representation of the event cited in this
Request. Zuffa refers to Exhibit 6 cited in the Request for a complete representation of its
contents.

5 Subject to and without waiver of its specific and general objections, Zuffa admits that
6 Lorenzo Fertitta stated in part that “From a fighter’s standpoint, we have taken these fighters, and
7 now we have the ability to allow them to make more money. They were stuck in Strikeforce,
where there was no pay-per-view revenue there.”

8 **REQUEST NO. 16.** Admit that in unedited footage of an interview with Lorenzo Fertitta from a
9 segment on ESPN’s “Outside The Lines” released by Zuffa on January 16, 2012, Lorenzo Fertitta
10 stated: “There are no barriers to entry in this business. Now, the perfect example is look what we
11 did. Do you know what we did? We took our money, we risked it. We went out and got a
promoter’s license. We put together a great business plan. We rolled up our sleeves, we worked,
and we made this work. And we built this business. Somebody else can do that – easily. There are
no barriers to entry,” as reflected in Exhibit 6.

12 **RESPONSE NO. 16:** Zuffa hereby incorporates the General Objections as though stated in full
13 herein. Zuffa further objects to Exhibit 6 as an incomplete representation of the event cited in this
14 Request. Zuffa refers to Exhibit 6 cited in the Request for a complete representation of its
contents.

15 Subject to and without waiver of its specific and general objections, Zuffa admits.

16 **REQUEST NO. 17.** Admit that in unedited footage of an interview with Lorenzo Fertitta from a
17 segment on ESPN’s “Outside The Lines” released by Zuffa on January 16, 2012, Lorenzo Fertitta
18 stated: “There never has been a comparable outlet [to the UFC]. There never has been. When has
19 there ever been a comparable outlet? We’ve dominated this, this sport, alright? We’ve dominated
the space,” as reflected in Exhibit 6.

20 **RESPONSE NO. 17:** Zuffa hereby incorporates the General Objections as though stated in full
21 herein. Zuffa further objects to Exhibit 6 as an incomplete representation of the event cited in this
Request. Zuffa refers to Exhibit 6 cited in the Request for a complete representation of its
contents

22 **Subject to and without waiver of its specific and general objections, Zuffa admits.**

23 **REQUEST NO. 18.** Admit that in a 2013 interview with GlobalSportsJobs.com, Lorenzo Fertitta
stated: “I think growing up and being such a big boxing fan, I really did look up to what Don
King and Bob Arum, being successful promoters, were able to achieve. They paved the way for
basically our business model. They paved the way as far as broadening the landscape of fans for
combat sports,” as reflected in Exhibit 7.

24 **RESPONSE NO. 18:** Zuffa hereby incorporates the General Objections as though stated in full
25 herein. Zuffa further objects to Exhibit 7 as an incomplete representation of the event cited in this
Request.

1 Request. Zuffa refers to Exhibit 7 cited in the Request for a complete representation of its
2 contents.

3 Subject to and without waiver of its specific and general objections, Zuffa admits.

4 **REQUEST NO. 19.** Admit that on January 8, 2013 at the New Media Expo Convention in Las
5 Vegas, Nevada, Dana White stated: “We have the largest fight library in the world. We bought a
6 bunch of different leagues out there – WEC, WFA, Pride – and we have a huge library that we
7 monetize,” as reflected in Exhibit 8.

8 **RESPONSE NO. 19:** Zuffa hereby incorporates the General Objections as though stated in full
9 herein. Zuffa further objects to Exhibit 8 as an incomplete representation of the event cited in this
10 Request. Zuffa refers to Exhibit 8 cited in the Request for a complete representation of its
11 contents.

12 Subject to and without waiver of its specific and general objections, Zuffa admits, except
13 that the event referred to in Request No. 19 took place on January 7, 2013.

14 **REQUEST NO. 20.** Admit that on February 16, 2013 at the UFC on FUEL TV 7 post-fight
15 media scrum in London, England, that Dana white stated: “I can tell you this man. If you fucking
16 call Joe Silva and turn down a fight, you might as well say fucking rip up my contract. He’s a
17 mean little fucker. You don’t call Joe Silva and tell him you don’t want to fucking fight anybody
18 man. You might as well just take the fight because it’s going to be worse. You might as well just
19 do it. Fuck it, alright I’ll fight him,” as reflected in Exhibit 9.

20 **RESPONSE NO. 20:** Zuffa hereby incorporates the General Objections as though stated in full
21 herein. Zuffa further objects to Exhibit 9 as an incomplete representation of the event cited in this
22 Request. Zuffa refers to Exhibit 9 cited in the Request for a complete representation of its
23 contents.

24 Subject to and without waiver of its specific and general objections, Zuffa admits.

25 **REQUEST NO. 21.** Admit that on February 22, 2013 at the UFC 157 pre-fight media scrum in
26 Anaheim, California, Dana White stated: “This is the UFC. This is the pinnacle of this sport. The
27 best fighters in the world fight here.”

28 **RESPONSE NO. 21:** Zuffa hereby incorporates the General Objections as though stated in full
herein.

29 Subject to and without waiver of its general objections, Zuffa admits.

30 **REQUEST NO. 22.** Admit that on February 22, 2013 at the UFC 157 pre-fight media scrum in
31 Anaheim, California, Dana White stated: “We have 470-something guys under contract, okay?
32 We have over 100 guys too many. We have over 100 guys too many on the roster right now,” as
33 reflected in Exhibit 10.

34 **RESPONSE NO. 22:** Zuffa hereby incorporates the General Objections as though stated in full
35 herein. Zuffa further objects to Exhibit 10 as an incomplete representation of the event cited in
36 this Request. Zuffa refers to Exhibit 10 cited in the Request for a complete representation of its
37 contents.

1 Subject to and without waiver of its specific and general objections, Zuffa admits.

2 **REQUEST NO. 23.** Admit that on April 8, 2013 at the Global Speaker Series at the Stanford
3 Graduate School of Business in Stanford, California, Dana White stated: “The biggest mistake
4 that everybody makes when they try to compete with us is that they try to compete with us,” as
reflected in Exhibit 11.

5 **RESPONSE NO. 23:** Zuffa hereby incorporates the General Objections as though stated in full
6 herein. Zuffa further objects to Exhibit 11 as an incomplete representation of the event cited in
this Request. Zuffa refers to Exhibit 11 cited in the Request for a complete representation of its
7 contents.

8 Subject to and without waiver of its specific and general objections, Zuffa admits.

9 **REQUEST NO. 24.** Admit that on April 8, 2013 at the Global Speaker Series at the Stanford
10 Graduate School of Business in Stanford, California, Dana White stated: “Nobody ever wants to
11 look at themselves as a feeder league to the UFC. Deal with it. You’re all feeder leagues to the
UFC, okay. I want them to exist and make money because those guys create the next talent that
will end up in our organization someday,” as reflected in Exhibit 11.

12 **RESPONSE NO. 24:** Zuffa hereby incorporates the General Objections as though stated in full
13 herein. Zuffa further objects to Exhibit 11 as an incomplete representation of the event cited in
this Request. Zuffa refers to Exhibit 11 cited in the Request for a complete representation of its
14 contents.

15 Subject to and without waiver of its specific and general objections, Zuffa admits.

16 **REQUEST NO. 25.** Admit that on November 15, 2013 at the UFC 167 pre-fight media scrum in
17 Las Vegas, Nevada, Dana White stated regarding Strikeforce: “I feel sorry for the kids that fight
there. I do, I truly feel sorry for the kids that have to be stuck in that shithole,” as reflected in
18 Exhibit 12.

19 **RESPONSE NO. 25:** Zuffa hereby incorporates the General Objections as though stated in full
20 herein. Zuffa further objects to Exhibit 12 as an incomplete representation of the event cited in
this Request. Zuffa refers to Exhibit 12 cited in the Request for a complete representation of its
21 contents.

22 Subject to and without waiver of its specific and general objections, Zuffa admits, except
that the event referred to in Request No. 25 took place on November 14, 2013.

23 **REQUEST NO. 26.** Admit that in an interview that aired on February 13, 2014 with Graham
24 Bensinger on “In Depth With Graham Bensinger,” Dana White stated regarding fighter pay in the
UFC: “The opportunities today are just like playing in the NFL or playing in the NBA or Major
25 League Baseball,” as reflected in Exhibit 13.

26 **RESPONSE NO. 26:** Zuffa hereby incorporates the General Objections as though stated in full
27 herein. Zuffa further objects to Exhibit 13 as an incomplete representation of the event cited in
this Request. Zuffa refers to Exhibit 13 cited in the Request for a complete representation of its
28 contents.

1 Subject to and without waiver of its specific and general objections, Zuffa admits.

2 **REQUEST NO. 27.** Admit that in an interview that aired on February 13, 2014, with Graham
3 Bensinger on “In Depth With Graham Bensinger,” Dana White stated: “Trust me when I tell you
4 these guys [UFC fighters] are making a lot of money. And we are on par with all the other sports
leagues out there,” as reflected in Exhibit 13.

5 **RESPONSE NO. 27:** Zuffa hereby incorporates the General Objections as though stated in full
herein. Zuffa further objects to Exhibit 13 as an incomplete representation of the event cited in
6 this Request. Zuffa refers to Exhibit 13 cited in the Request for a complete representation of its
contents.

7 Subject to and without waiver of its specific and general objections, Zuffa admits that
8 Dana White stated in part “Trust me when I tell you these guys are making a lot of money. And
9 we are on par with all the other sports leagues out there.”

10 **REQUEST NO. 28.** Admit that on April 4, 2014, at The Leaders Sport Summit in London,
England, Lorenzo Fertitta stated: “You put these athletes that are world class in the Octagon, let
11 them compete, that translates anywhere in the world,” as reflected in Exhibit 14.

12 **RESPONSE NO. 28:** Zuffa hereby incorporates the General Objections as though stated in full
herein. Zuffa further objects to Exhibit 14 as an incomplete representation of the event cited in
13 this Request. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its
contents.

14 Subject to and without waiver of its specific and general objections, Zuffa admits, except
that the event referred to in Request No. 28 took place in March 2014.

15 **REQUEST NO. 29.** Admit that on April 4, 2014, at The Leaders Sport Summit in London,
England, Lorenzo Fertitta stated UFC fighters are “world class,” as reflected in Exhibit 14.

16 **RESPONSE NO. 29:** Zuffa hereby incorporates the General Objections as though stated in full
herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its
17 contents.

18 Subject to and without waiver of its specific and general objections, Zuffa admits that
Lorenzo Fertitta stated in part “world class,” except that the event referred to in Request No. 29
19 took place in March 2014. Zuffa otherwise denies this Request.

20 **REQUEST NO. 30.** Admit that on April 4, 2014, at The Leaders Sport Summit in London,
England, Lorenzo Fertitta stated: “There’s going to be some [fighters] that are more popular than
21 others, but at the end of the day, it’s the UFC that’s the seal and the brand that says to the
consumer that these are the best fighters in the world,” as reflected in Exhibit 14.

22 **RESPONSE NO. 30:** Zuffa hereby incorporates the General Objections as though stated in full
herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its
23 contents.

24 Subject to and without waiver of its specific and general objections, Zuffa admits, except
that the event referred to in Request No. 30 took place in March 2014.

1 **REQUEST NO. 31.** Admit that on April 4, 2014, at The Leaders Sport Summit in London,
2 England, Lorenzo Fertitta stated: “At the end of the day, we have built this business to the point
3 where I think from a consumer’s standpoint, people don’t necessarily refer to MMA. They don’t
4 say ‘Hey, I’m going to watch an MMA fight tonight.’ We have sort of transcended this sport in a
5 sense that UFC has become the sport in a way,” as reflected in Exhibit 14.

6 **RESPONSE NO. 31:** Zuffa hereby incorporates the General Objections as though stated in full
7 herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its
8 contents.

9 Subject to and without waiver of its specific and general objections, Zuffa admits, except
10 that the event referred to in Request No. 31 took place in March 2014.

11 **REQUEST NO. 32.** Admit that on April 4, 2014, at The Leaders Sport Summit in London,
12 England, Lorenzo Fertitta stated: “[A]t the end of the day, we really have kind of become the gold
13 standard in a sense. When you look at the top 10 in every division, we’ve got every fighter under
14 our umbrella. All the fighters want to be with us because they want to fight the best competition.
15 So from that standpoint, I think there is really – the competition isn’t really relevant in that
16 sense,” as reflected in Exhibit 14.

17 **RESPONSE NO. 32:** Zuffa hereby incorporates the General Objections as though stated in full
18 herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its
19 contents.

20 Subject to and without waiver of its specific and general objections, Zuffa admits, except
21 that the event referred to in Request No. 32 took place in March 2014.

22 **REQUEST NO. 33.** Admit that on April 4, 2014, at The Leaders Sport Summit in London,
23 England, Lorenzo Fertitta stated: “We’re lucky in the sense that for any aspiring athlete that
24 wants to become a fighter, we’re at the top of the food chain. They want to, their goal is
25 eventually to get to the UFC. So the talent pool is kind of coming to us so we kind of have the
26 pick of the best fighters that are potentially out there,” as reflected in Exhibit 14.

27 **RESPONSE NO. 33:** Zuffa hereby incorporates the General Objections as though stated in full
28 herein. Zuffa refers to Exhibit 14 cited in the Request for a complete representation of its
29 contents.

30 Subject to and without waiver of its specific and general objections, Zuffa admits, except
31 that the event referred to in Request No. 33 took place in March 2014.

32 **REQUEST NO. 34.** Admit that on July 5, 2016, at the UFC 162 pre-fight media scrum in Las
33 Vegas, Nevada, Dana White stated that “the guys who are complaining about this [fighter pay]
34 are the guys who don’t matter,” as reflected in Exhibit 15.

35 **RESPONSE NO. 34:** Zuffa hereby incorporates the General Objections as though stated in full
36 herein. Zuffa further objects to Exhibit 15 as an incomplete representation of the event cited in
37 this Request. Zuffa refers to Exhibit 15 cited in the Request for a complete representation of its
38 contents.